

JUDGE KATHLEEN CARDONE

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

2020 JUL -8 PM 6:10

UNITED STATES OF AMERICA,

Plaintiff,

v.

MANUEL FLORES,

Defendants.

§ CRIMINAL NO. EP-20-CR-

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INDICTMENT

CT 1: 18 U.S.C. § 875(c) -

Communicating a Threat in Interstate  
Commerce

**EP20CR1510**

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 875(c))

That on or about June 13, 2020, in the Western District of Texas, and elsewhere, the  
Defendant,

**MANUEL FLORES,**

knowingly and willfully did transmit a communication in interstate and foreign commerce, and the  
communication contained a threat to injure Black Lives Matter protesters, specifically stating that  
he had "500 rounds of something, 500 rounds of 5.56" and to "take out at least 200" individuals,  
in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL

ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

JOHN F. BASH  
UNITED STATES ATTORNEY

BY:

  
Assistant U.S. Attorney